

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Case No. 19-24857-CMB
	)	
Nakia Henderson	)	Chapter 13
Debtor	)	
	)	Claim. No.: 11
Nakia Henderson	)	
Movant	)	
	)	
v.	)	
	)	
Deutsche Bank National Trust Co., etal	)	
Ronda J. Winnecour, Trustee	)	
Respondent(s)	)	

**DECLARATION**

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Deutsche Bank National Trust Co., etal's Notice of Mortgage Payment Change dated November 28, 2023, the Debtor's current escrow payment for account number ending in **2591** is **\$92.09**. The new escrow payment is **\$117.05**. The new total mortgage payment is **\$533.47** effective January 1, 2024. The Debtor's Chapter 13 Plan is sufficient. The Debtor will pay the shortage directly to the Chapter 13 Trustee.

Dated: **December 17, 2023**

Respectfully submitted by:  
**/s/ Nakia Henderson**  
Nakia Henderson

Dated: **December 17, 2023**

Respectfully submitted by:  
**/s/ Albert G. Reese, Jr., Esquire**  
Albert G. Reese, Jr., Esquire  
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